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August 7, 2020

**BY ECF**

Honorable Denise L. Cote  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Zalmund Zirkind, S9 19 Cr. 463 (DLC)***  
LETTER MOTION TO AMEND CONDITIONS OF BOND TO PERMIT GREATER  
ATTENDANCE AT RELIGIOUS PRAYER SERVICES

Dear Judge Cote:

On behalf of Mr. Zirkind, this application follows advisement by Pretrial Services that in order to permit the Defendant to attend prayer services more than one time weekly, an application must be made directly to this Honorable Court.

By way of background information, the Defendant was arrested in the Northern District of New York on July 16, 2020 and was released on stipulated bond conditions that include home confinement on August 5, 2020, shortly after his arrival in the Southern District of New York. The Defendant is the subject of a one-count indictment charging that he laundered narcotics proceeds in violation of Title 18, United States Code, Sections 1956 (a)(1)(A)(i), (a)(1)(B), (a)(2)(A), (a)(2)(B), and 1957(a).

The Defendant can be described as an Orthodox Rabbi, of the Chabad sect. He is educated in Jewish law and received rabbinical training in the United States and Israel. His Jewish law makes it his duty to pray three times daily: in the morning, in the afternoon and at nightfall. These prayers are called morning prayer (shacharit), afternoon prayer (minchah) and evening prayer (arvith or maariv). He adheres to this daily prayer schedule during his adulthood in a synagogue or minyan (his religion adheres to the belief that the Lord hears the prayers of those who participate in communal prayer that includes 10 adult males). His requested prayer schedule follows:

Daily prayers:

5:00 AM - 5:30 AM: Ritual bath located at Congregation Rayim Ahuvim, 1614 Carroll Street, Brooklyn, NY 11213;

6:30 AM - 8:30 AM: Morning prayers service located at Congregation Rayim Ahuvim, 1614 Carroll Street, Brooklyn, NY 11213;

1:30 PM- 2:30 PM: Afternoon services located at Congregation Lubavitcher, 770 Eastern Parkway Brooklyn, NY 11213;

8:30 PM - 9:15 PM: Evening services located at Congregation Rayim Ahuvim, 1614 Carroll Street, Brooklyn, NY 11213.

Sabbath schedule:

Friday evening:

7:30 PM -10:30 PM- services at Congregation Lubavitcher, 770 Eastern Parkway Brooklyn, NY 11213.

Saturday:

9:30 AM- 2:00 PM prayers at Congregation Lubavitcher, 770 Eastern Parkway Brooklyn, NY 11213;

7:30 PM-8:30 PM Sabbath evening prayers at Congregation Lubavitcher, 770 Eastern Parkway Brooklyn, NY 11213.

In his lifetime, the Defendant believes the Jewish Bible, the Torah, mandates a way of life in every detail. The Torah contains 613 commandments. Among them is the prayer service, Friday night after sunset and Saturday, as described above. The Orthodox Judaism advocates a strict observance of Jewish law, according to traditional methods, and in adherence to a continuum through the ages. Orthodox Judaism emphasizes practicing many rules including kashrut (kosher foods), Shabbat, and tefilah (daily prayer). The Defendant will verify attendance at religious services as directed by Pretrial Services.

Counsel has reviewed this request with AUSA Stephanie Lake who agrees with the relief requested, except the Government does not take a position on the daily ritual bath.

We thank Your Honor for your review.

Respectfully submitted,

*/s/ Neil M. Schuster*

Neil M. Schuster

NMS:asnd

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